

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6365-CR-DIMITROULEAS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JULIET SHAW,

Defendant(s).

_____ /

MOTION TO ENABLE PROBATION DEPARTMENT TO VERIFY
DEFENDANT JULIET SHAW'S EMPLOYMENT BY USING PAY STUBS

The Defendant, JULIET SHAW by and through undersigned Counsel files this her Motion to have the Probation Department verify her employment by using pay stubs or any other means except by contacting her employer, and states:

1. That the Defendant, JULIET SHAW is employed by Catalano's Health Agency.
2. That there is a strong possibility that she will loose her job if her employer is aware of her circumstances.
3. That sentencing in this case has been scheduled for May 18, 2001.
4. That the Defendant, JULIET SHAW is not a threat to her employer, employees or her patients, with whom she has personal contacts on a daily basis.

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5. That the Probation Department is desirous in contacting

the Defendant's employer for the sole purpose of establishing employment.

6. That if her employer is aware of her problems in Federal Court it is apparent that she will be dismissed.

7. That Roger Powell, AUSA has indicated that he will support the decision of the U.S. Probation.

WHEREFORE the Defendant, JULIET SHAW requests that she verify her employment by presenting her regular pay stubs.

Respectfully Submitted,

ABE A. BAILEY, P.A.
18350 N.W. 2nd Avenue, Suite 500
Miami, Florida 33169
(305) 653-8860/61

By: _____

ABE A. BAILEY, ESQUIRE
FBN:0480398

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S. Mail to Roger Powell, AUSA at the United States Attorney's Office, 500 East Broward Boulevard, Fort Lauderdale, Florida and U.S. Probation Office at 299 East Broward Boulevard, #409, Federal Building, Fort Lauderdale, Florida 33301 on this 12th day of March, 2001.

ABE A. BAILEY, ESQUIRE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6365-CR-DIMITROULEAS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JULIET SHAW,

Defendant.

ORDER ON MOTION TO ENABLE PROBATION DEPARTMENT
TO VERIFY DEFENDANT JULIET SHAW'S EMPLOYMENT BY USING PAY STUBS

THIS CAUSE is before the Court upon the Defendant's Motion To enable Probation Department to verify her employment by using pay stubs.

After a careful review of the pleadings and the Court being fully advised in the premises, it is hereby,

ORDERED AND ADJUDGED that the Defendant's motion is hereby _____ .

DONE AND ORDERED in Chambers at the United States District Courthouse, Fort Lauderdale, this ____ day of _____, 2001.

UNITED STATES DISTRICT JUDGE

Copies furnished to:

Abe A. Bailey, Esquire
Roger Powell, AUSA
U.S. Probation Office